

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION	Case No. 1:17-MD-2804
<i>APPLIES TO ALL CASES</i>	Hon. Dan. A. Polster

**NOTICE OF FILING UNREDACTED AND/OR LESS REDACTED PLAINTIFFS'
CONSOLIDATED MEMORANDUM IN OPPOSITION TO DEFENDANTS' MOTIONS
FOR PARTIAL SUMMARY JUDGMENT ON
STATUTE OF LIMITATIONS GROUNDS and EXHIBITS**

Plaintiffs hereby provide notice of, and file into the public record, the attached unredacted and/or less redacted pre-trial brief and exhibits. Pursuant to the Order Regarding Redacting and Sealing of Documents (Doc. No. 2909), various confidentiality rulings, meet and confers between Plaintiffs, Defendants and third parties, and/or the resulting withdrawal of confidentiality designations, the attached previously redacted materials are hereby publicly filed as unredacted or less redacted. In the interest of clarity and completeness, Plaintiffs hereby re-refile the related brief (even if not previously redacted) and less redacted or unredacted exhibits attached hereto. Finally, for tracking and/or cross-referencing purposes, the below chart lists the original filing events related to the documents that are being filed, their prior ECF numbers, and the prior and present state of redactions.

Document Title	Ex. #	Prior Public ECF No.	Prior Redactions	Current Redactions
Plaintiffs' Opposition to Defendants' Motions for Partial Summary Judgment on Statute of Limitations Grounds		2212	Yes	None now
Email from Dave Gustin to McKesson employees regarding Oxy and Hydro gaps MCKMDL0050799	32	2212-33	Under seal	Fewer

McKesson Document - McKesson's Controlled Substance Monitoring Program, Oxycodone Threshold Reduction Report, February 9, 2015 MCKMDL00402184	34	2212-35	Under seal	Fewer
CAH Document - Standard Operating Procedure, Pharmaceutical Distribution, July 18, 2013 CAH_MDL2804_00012244	38	2212-39	Yes	Fewer
Internal Report/Notes: Ullrich's response to 'my' PPT SOM Presentation CAH_MDL2804_02350970	39	2212-40	Yes	None now
Email - From Kim Howenstein to Kimberly Anna-Soisson, May 1, 2014, Subject: RE: Adjustments made can you take a quick look CAH_MDL2804_00012953	40	2212-41	Yes	None now
Email - From Emma Douglas to Christopher Forst (and others), April 12, 2013, Subject: RE: Just a Thought CAH_MDL2804_00009412	41	2212-42	Yes	Fewer

Dated: December 17, 2019

Respectfully submitted,

/s/ Anthony D. Irpino
 Anthony D. Irpino (LA Bar# 24727)
 Pearl A. Robertson
 IRPINO LAW FIRM
 2216 Magazine Street
 New Orleans, LA 70130
 (504) 525-1500
 (504) 525-1501 (Fax)
airpino@irpinolaw.com
probertson@irpinolaw.com
Plaintiffs' Counsel

Paul T. Farrell, Jr., Esq.
 GREENE KETCHUM, LLP
 419 Eleventh Street

Huntington, WV 25701
(304) 525-9115
(800) 479-0053
(304) 529-3284 (Fax)
paul@greeneketchum.com
Plaintiffs' Co-Lead Counsel

Paul J. Hanly, Jr.
SIMMONS HANLY CONROY
112 Madison Avenue, 7th Floor
New York, NY 10016
(212) 784-6400
(212) 213-5949 (Fax)
phanly@simmonsfirm.com
Plaintiffs' Co-Lead Counsel

Joseph F. Rice
MOTLEY RICE
28 Bridgeside Blvd.
Mt. Pleasant, SC 29464
(843) 216-9000
(843) 216-9290 (Fax)
jrice@motleyrice.com
Plaintiffs' Co-Lead Counsel

Peter H. Weinberger (0022076)
SPANGENBERG SHIBLEY & LIBER
1001 Lakeside Avenue East, Suite 1700
Cleveland, OH 44114
(216) 696-3232
(216) 696-3924 (Fax)
pweinberger@spanglaw.com
Plaintiffs' Co-Liaison Counsel

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 17th day of December, 2019, I have electronically filed the foregoing with the Clerk of Court using the CM/ECF System. Copies will be served upon counsel of record by, and may be obtained through, the Court's CM/ECF System.

/s/ Anthony D. Irpino
Anthony D. Irpino